

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

LOUIS G. RASETTA and JOHN J. SHAUGHNESSY,  
as they are TRUSTEES, INTERNATIONAL UNION  
OF OPERATING ENGINEERS LOCAL 4 HEALTH  
AND WELFARE, PENSION AND ANNUITY FUNDS,  
and LOUIS G. RASETTA and CHRISTOPHER  
BARLETTA, as they are TRUSTEES, HOISTING AND  
PORTABLE ENGINEERS LOCAL 4 APPRENTICE  
AND TRAINING FUNDS and INTERNATIONAL  
UNION OF OPERATING ENGINEERS, LOCAL 4,  
Plaintiffs

C.A. No. 05-10425 RCL

vs.

SAI SURVEYING CORPORATION and  
BARBARA SZEPAWOWSKI,  
Defendants

and

CITIZENS BANK,  
Trustee

**AFFIDAVIT OF ANNE R. SILLS**

1. My name is Anne R. Sills. I am an attorney with the law firm of Segal, Roitman & Coleman.

2. This firm has been involved in efforts to collect contributions owed the International Union of Operating Engineers Employee Benefit Funds by SAI Surveying Corporation for the period of July through December, 2004 since on or about February 20, 2005.

Since that date, we have incurred legal fees of \$1,696.00 and costs of \$125.00.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 24<sup>th</sup> DAY OF  
JUNE, 2005.

/s/ Anne R. Sills  
Anne R. Sills, Esquire

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above Affidavit has been served by certified and first class mail upon the defendants, SAI Surveying Corporation and Barbara Szepatowski at 23 Narragansett Avenue, Jamestown, RI 02835 this 24<sup>th</sup> day of June, 2005.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire